

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

UMG RECORDINGS, INC., et al.,)
)
Plaintiffs,)
)
vs.) No. 1:17-cv-00365-LY
GRANDE COMMUNICATIONS)
NETWORKS LLC,)
)
Defendant.)
)

**DECLARATION OF RICHARD L. BROPHY IN SUPPORT OF
DEFENDANT GRANDE COMMUNICATIONS NETWORKS LLC'S REPLY IN
SUPPORT OF MOTION FOR SANCTIONS AND TO EXCLUDE
DOCUMENTS PRODUCED AFTER THE FACT DISCOVERY DEADLINE**

I, Richard L. Brophy, declare as follows:

1. I am licensed to practice law in the State of Missouri and am a partner at the law firm of Armstrong Teasdale LLP. I am counsel of record for Defendant, Grande Communications Networks LLC ("Grande") in this suit against Plaintiffs UMG Recordings, Inc., et al. ("Plaintiffs"). I have been admitted to practice in the Western District of Texas on a *pro hac vice* basis pursuant to ECF No. 25 entered on May 23, 2017. I submit this declaration in support of Defendant Grande's Reply in Support of its Motion for Sanctions. I have personal knowledge of the facts set forth below and if called upon and sworn as a witness, I could and would competently testify to them.

2. Exhibit 1 attached hereto is a true and correct copy of an email I received from Michael Petrino, Plaintiffs' counsel, on September 4, 2018.

3. Exhibit 2 attached hereto is a true and correct copy of an email I received from Kevin Attridge, Plaintiffs' counsel, at 5:14 p.m. (CT) on September 11, 2018.

4. Exhibit 3 attached hereto is a true and correct copy of an email I received from Kevin Attridge, Plaintiffs' counsel, at 7:55 p.m. (CT) on September 11, 2018.

5. Exhibit 4 attached hereto is a true and correct copy of an email I received from Kevin Attridge, Plaintiffs' counsel, on September 12, 2018.

I declare under penalty of perjury that the foregoing is true and accurate.

Executed on September 21, 2018 in St. Louis, Missouri.

/s/ *Richard L. Brophy*
Richard L. Brophy